

**AKIN & SALAMAN**  
45 BROADWAY  
SUITE 1420  
NEW YORK, NEW YORK 10006  
Tel. (212) 825-1400 Fax. (212) 825-1440

July 10, 2023

**Via ECF**

United States District Court  
Eastern District of New York  
Honorable Sanket J. Bulsara  
225 Cadman Plaza East  
Brooklyn, NY 11201

**Re: *Fidan, et al. v. Istanbul Rego Park Inc., et al.***  
Case No. 22-CV-2252 (ENV) (SJB)  
**Status Letter**

Dear Judge Bulsara:

Our office represents Plaintiffs Ali Fidan and Ece Karagoz (collectively, “Plaintiffs”) in the above-referenced matter. In advance of the Status Conference scheduled for Wednesday, July 12, 2023 at 2:00 p.m., we write to advise the Court of the current status of discovery.<sup>1</sup> Defendants have provided documents in response to Plaintiff’s document requests; however, Defendants have not formally responded to Plaintiff’s interrogatories or Plaintiff’s document demands. Depositions also remain outstanding.

As such, we respectfully request a 60-day extension of the fact discovery deadline from August 4, 2023 to October 4, 2023 to complete all remaining discovery. This is the parties’ second request for an extension.

We thank the Court for its attention to this matter.

Respectfully submitted,

**Akin & Salaman**

/s/ Robert D. Salaman  
Robert D. Salaman  
45 Broadway, Suite 1420  
New York, NY 10006  
(212) 825-1400

*Attorneys for Plaintiffs*

cc: Emanuel Kataev (via ECF)  
Attorneys for Defendants

---

<sup>1</sup> We reached out to Defendants’ counsel in advance of filing this letter but have not heard back.